OPERATOR QUALIFICATION
THE
INSPECTION PROTOCOLS

OQ PUBLIC MEETING
ATLANTA, GEORGIA
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OBJECTIVES

- **THE PROTOCOLS - WHAT ARE THEY**

- **HOW INSPECTORS WILL USE THEM**

- **EXAMPLE PROTOCOLS**

- **ADDITIONAL INFORMATION**

PROTOCOLS

- After describing the 8 elements of the rule, protocols were developed to evaluate OQ programs.

- Sixteen protocols questions were restructured to focus on verification of rule requirements and provisions established under the verification.

Elements

- Element 1 – Document Program Plan, Implementing Procedures and Qualification Criteria: Five protocol questions

- Element 2 – Identify Covered Tasks and Related Evaluation Methods: Two protocol questions

Elements – Cont'd

- Element 3 – Identify Individuals Performing Covered Tasks: Two protocol questions

- Element 4 – Evaluate and Qualify Individuals Performing Covered Tasks: Two protocol questions

Elements – Cont'd

- Element 5 – Continued/Periodic Evaluation of Individuals Performing Covered Tasks: Two protocol questions

- Element 6 – Monitor Program Performance; Seek Improvement Opportunities: One protocol question

Elements – Cont'd

- Element 7 – Maintain Program Records: One protocol question

- Element 8 – Manage Change: One protocol question

How Inspectors Will Use the Protocols

- Statement on the Use of OQ Protocols

  - Nature of the Role is addressed for both operator and inspector

  - Secondly, the Role of the Protocols is contained in the statement

Statement on the Use of OQ Protocols

- Nature of the Rule

  - OQ Rule is performance-based rule

  - Need for a management practices

  - Measurement of effectiveness

Statement on the Use of OQ Protocols

- Nature of the Rule – Cont'd

    - Will evaluate compliance of prescriptive provisions

    - Also evaluate completeness and anticipated effectiveness of the documented approaches to qualify individuals

Statement on the Use of OQ Protocols

- The Role of Protocols

    - Used to support inspectors in evaluating OQ Programs

    - Protocols are structured into "Protocol Questions", most which are paired directly with prescriptive requirements of the rule

Statement on the Use of OQ Protocols

- The Role of Protocols

  - "Enforceable" and "Non-Enforceable"

  - "Guidance Topics"
    - Expected characteristics of an effective OQ Program
    - Guidance Topics are consistent with the intent of the Rule

Protocol #3.02

Covered Task Performed by Non-Qualified Individual

<u>Protocol Question</u>

Has the operator established provisions to allow non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are there restrictions and limitations placed on such activities?

Protocol #3.02 (Cont'd)

Verify that the operator's program includes provisions for the performance of a covered task by a non-qualified individual under the direction and observation by a qualified Individual.

[**Enforceable**]

Protocol #3.02 (Cont'd)

<u>Guidance Topics</u>

The rule allows the performance of a covered task by a non-qualified individual if that individual is directed and observed by an individual qualified to perform the covered task.

Investigation of the following characteristics is important to determine whether the requirements of the rule have been met:

Protocol #3.02 (Cont'd)

Guidance Topics

1. Consideration has been given to tasks that cannot or should not be performed by non-qualified individuals under the direction and observation of a qualified individual, due to their complexity or due to the critical nature of the task.

Protocol #3.02 (Cont'd)

Guidance Topics

2. For tasks where appropriate, guidance on the span of control by qualified individuals of non-qualified individuals has been established on a task-specific basis.

Protocol #3.02 (Cont'd)

Rule Requirement

§805/505 Qualification Program

Each operator shall have and follow a written qualification program. The program shall Include provision to:

    (c) Allow individuals that are not qualified pursuant to this subpart to perform a covered task if directed and observed by an individual that is qualified;

Protocol #1.04

Training Requirements (Initial Qualification, Remedial if Initial Failure, and Reevaluation)

Protocol Question

Does the operator's OQ program plan contain policy And criteria for the use of training in initial qualification of individuals performing covered tasks, and are criteria in existence for re-training and re-evaluation of individuals if qualifications are questioned? **[Non-Enforceable]**

Protocol #1.04 (Cont'd)

Guidance Topics

Training is not a required action under the provisions of the OQ rule. However, training is a means to ensure that an individual performing a covered task has the necessary knowledge and skills needed to perform the task in a manner that ensures the safe operation of pipeline facilities, as required by the Pipeline Safety Act.

Protocol #1.04 (Cont'd)

Guidance Topics

As such, it should be incorporated in practices leading to the development and qualification of new employees, as well as in refreshing the knowledge and skills of individuals with considerable experience.

Investigation of the following characteristics is important to determine whether the requirements of the rule have been met:

Protocol #1.04 (Cont'd)

Guidance Topics (cont'd)

The role represented by training in the qualification of individuals to perform covered tasks in:

Protocol #1.04 (Cont'd)

Guidance Topics (cont'd)

Development of new hires, correction of problems countered in evaluation or reevaluation processes, correction of individual performance problems (e.g.,contributing to an incident or accident through performance of covered tasks), managing changes in practices or procedures used in performing covered tasks.

Protocol #1.04 (Cont'd)

Rule Requirement

§ 192.803/195.503 Definitions

Qualified means that an individual has been evaluated and can:

   (a) Perform assigned covered tasks; and

   (b) Recognize and react to abnormal operating conditions.

Protocol #1.04 (Cont'd)

Rule Requirement

§ 192.805/195.505 Qualification Program
Each operator shall have and follow a written
Qualification program. The program shall include
provisions to:

(b) Ensure through evaluation that individuals
performing covered tasks are qualified;

Additional Information

OPS Website

http://primis.rspa.dot.gov/oq